



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

June 23, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: Autoliv, ASP

183-16230-00029

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02



Frank O'Bannon
Governor

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Autoliv, ASP
4868 East Park 30 Drive
Columbia City, IN 46725**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F183-16230-00029	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 23, 2003 Expiration Date: June 23, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary automobile steering wheel manufacturing source.

Authorized Individual:	Safety and Environmental Engineer
Source Address:	4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address:	4868 East Park 30 Drive, Columbia City, IN 46725
General Source Phone:	(260) 244-4941
SIC Code:	3714
County Location:	Whitley
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) five (5) urethane molding units, identified as UM-2, UM-3, and UM-4, constructed in August 1998, and UM-6 and UM-7, respectively constructed in April and July 2000, each producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:
 - (1) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
 - (2) three (3) pairs of molds; and
 - (3) three (3) pairs of exhaust cabinets,controlled by dry filters and exhausting to stacks V-3, V-2, V-1, V-17 and V-18, respectively;
- (b) one (1) urethane molding unit, to be identified as UM-1 and commencing construction within 18 months of the issuance date of this renewal approval, producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:
 - (1) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
 - (2) three (3) pairs of molds; and

- (3) three (3) pairs of exhaust cabinets,
controlled by dry filters and exhausting to stack V-4;
- (c) paint mixing room ventilation, through stack V-9;
- (d) paint storage room ventilation, through stack V-10; and
- (e) storage room ventilation, through stack V-16.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu (MMBtu) per hour, including:
 - (1) two (2) 0.1 MMBtu per hour space heaters;
 - (2) three (3) 0.2 MMBtu per hour space heaters; and
 - (3) four (4) process heaters, each rated at 6.1 million Btu per hour.
- (b) Emissions from research and development activities, including:
one (1) nonproduction research and development urethane injection molding unit, identified as UM-5, using four (4) air atomization spray guns, with two (2) exhaust cabinets, controlled by two (2) dry filters, and exhausting to stack V-11.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (d) Emissions from a laboratory:
 - (1) one (1) urethane laboratory, with emissions exhausting to vent V-5; and
 - (2) one (1) quality assurance/quality control laboratory, with emissions exhausting to vents V-7 and V-8.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, or machining fluids:
 - (1) one (1) 1000 gallon oil interceptor tank; and
 - (2) two (2) 55 gallon drums of hydraulic oils.
- (f) Other categories with emissions below insignificant thresholds:
 - (1) three (3) pressure vented storage tanks, one (1) storing isocyanate and installed in April 2000, and two (2) storing polyol resin and installed in April 2000 and January 2001, with each tank having a capacity of 7,500 gallons, equipped with either nitrogen blanketing evaporation or compressed dry air control, and

emitting less than one (1) ton per year of a single HAP and less than 15 pounds per day of VOC.

- (2) two (2) air compressor units, located in the mechanical equipment room, venting hot air to stacks V-12 and V-13.
- (g) Production related activities, including the application of lubricants as temporary protective coatings.
- (h) Production related activities, including closed heating and cooling systems.
- (i) Repair activities including cleaning or repair of heat exchangers.
- (j) Paved roads and parking lots with public access.
- (k) Enclosed systems for conveying plastic raw material and plastic finished goods.
- (l) Activities associated with emergencies, including gasoline, diesel, or natural gas emergency generators, including:

one (1) 0.06 million Btu per hour natural gas fired emergency generator.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

GENERAL CONDITIONS

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA), and by citizens in accordance with the Clean Air Act.

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2. Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the

PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units and control equipment in Section A.2(b).
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

**C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) five (5) urethane molding units, identified as UM-2, UM-3, and UM-4, constructed in August 1998, and UM-6 and UM-7, respectively constructed in April and July 2000, each producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:
 - (1) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
 - (2) three (3) pairs of molds; and
 - (3) three (3) pairs of exhaust cabinets,controlled by dry filters and exhausting to stacks V-3, V-2, V-1, V-17 and V-18, respectively;
- (b) one (1) urethane molding unit, to be identified as UM-1 and commencing construction within 18 months of the issuance date of this renewal approval, producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:
 - (1) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
 - (2) three (3) pairs of molds; and
 - (3) three (3) pairs of exhaust cabinets,controlled by dry filters and exhausting to stack V-4;
- (c) paint mixing room ventilation, through stack V-9;
- (d) paint storage room ventilation, through stack V-10; and
- (e) storage room ventilation, through stack V-16.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) Pursuant to Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000, and 326 IAC 8-1-6 (General Reduction Requirements), the source shall comply with the following for urethane molding injection operations at UM-2, UM-3, UM-4, UM-6, and UM-7:

- (1) The VOC content of the mold cleaner used in the urethane injection molding units shall not exceed 8.30 pounds of VOC per gallon as applied and the VOC content of each ingredient used in the paint blend shall not exceed 6.71 pounds of VOC per gallon as applied.
 - (2) The following pollution prevention techniques shall be applied:
 - (A) monitoring of the pressure differential across the overspray filter shall be continuous;
 - (B) the spray guns applying the mold release agent and paint blend are the type that can be cleaned without the need for spraying the solvent into the air;
 - (C) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized;
 - (D) storage containers used to store VOC containing materials shall be kept covered when not in use;
 - (E) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
 - (F) proper equipment clean-up and maintenance; and
 - (G) proper testing of spray guns prior to daily use.
 - (3) The VOC emissions from the urethane injection molding units shall be limited to 91.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, and VOC solvents input to the units.
 - (4) Acetone shall remain substituted for the pure methyl ethyl ketone in the paint blend.
 - (5) The BACT shall be reopened and reevaluated if another similar operation is going to be installed at the source. BACT will be evaluated for the operations together to determine if the cost of control technology is feasible.
- (b) Any change or modification which may increase potential VOC usage to twenty-five (25) tons per year or more at UM-1 shall require prior approval from the Office of Air Quality (OAQ) before such change can occur. If such approval is required, then pursuant to D.1.1(a)(5), the best available control technology (BACT) determination shall be reopened and reevaluated to include facility UM-1.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2]

The total combined VOC input to the urethane injection molding units UM-1, UM-2, UM-3, UM-4, UM-6, and UM-7 shall be limited to ninety-eight (98) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization from the mold release agent, mold cleaner, paint blend, and VOC solvents input to the units.

Compliance with this condition shall limit the source-wide potential to emit VOC, including the potential to emit of insignificant activities, to less than one-hundred (100) tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70), and 326 IAC 2-2 (PSD), are not applicable to the source.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4][326 IAC 2-4.1-1]

- (a) The total combined input of methyl ethyl ketone (MEK) to the urethane injection molding units UM-1, UM-2, UM-3, UM-4, UM-6, and UM-7 shall be limited to less than nine and nine tenths (9.9) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Based on 100% volatilization, the MEK input will equal the MEK emitted. Compliance with this condition shall limit the source-wide potential to emit a single HAP, including the potential to emit of insignificant activities, to less than 10 tons per 12 consecutive month period.
- (b) Compliance with (a) of this condition shall also limit the source-wide potential to emit combined HAPs, including the potential to emit of insignificant activities, to less than twenty-five (25) tons per 12 consecutive month period. Any change or modification which may increase the source-wide potential to emit the combination of HAPs to 25 tons per 12 consecutive month period shall require OAQ's prior approval before such change can occur.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 not applicable to the urethane injection molding units.

D.1.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to FESOP No. 183-9405-00029, issued on July 20, 1998, and 40 CFR 52 Subpart P, the particulate matter (PM) from the urethane injection molding units' spray guns shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to FESOP No. 183-9405-00029, issued on July 20, 1998 and 326 IAC 6-3-2(d), particulate from the urethane injection molding units' spray guns shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the urethane injection molding units and their control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Conditions D.1.1(a)(3), D.1.1(b), and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks V-1, V-2, V-3, V-4, V-17 and V-18 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and emission limits established in Conditions D.1.1 and D.1.2, and the methyl ethyl ketone (MEK) usage limit established in Condition D.1.3. Records shall be available to IDEM, OAQ, within 30 days of the end of each compliance period.
 - (1) The VOC and MEK content (weight percent) of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The VOC content (pounds per gallon applied) of the ingredients used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The VOC and MEK usage for each month; and
 - (6) The total weight of MEK emitted for each compliance period; and
 - (7) The total weight of VOC emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a)(3), D.1.2, and D.1.3(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) urethane molding unit, to be identified as UM-1 and commencing construction within 18 months of the issuance date of this renewal approval, producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:

- (a) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
- (b) three (3) pairs of molds; and
- (c) three (3) pairs of exhaust cabinets,

controlled by dry filters and exhausting to stack V-4;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.2.1 Permit No Defense

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.2.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

The Permittee shall comply with the Conditions established in Section D.1.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP No.: F183-16230-00029

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP No.: F183-16230-00029

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two **(2)** working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP No.: F183-16230-00029
Facility: urethane injection molding (UM-1, -2, -3, -4, -6, and UM-7)
Parameter: methyl ethyl ketone (MEK), as a single hazardous air pollutant (HAP)
Limit: total combined input of methyl ethyl ketone (MEK) to the urethane injection molding units UM-1, UM-2, UM-3, UM-4, UM-6, and UM-7 shall be limited to less than less than nine and nine tenths (9.9) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Based on 100% volatilization, the MEK input will equal the MEK emitted.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total MEK Usage This Month (tons)	Total MEK Usage Previous 11 Months (total)	12 Month Total MEK Usage
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP No.: F183-16230-00029
Facility: urethane Injection molding (UM-2, -3, -4, -6, and UM-7)
Parameter: volatile organic compounds (VOC)
Limit: VOC emissions from the urethane injection molding units shall be limited to 91.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, and VOC solvents input to the units.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total VOC Usage This Month (tons)	Total VOC Usage Previous 11 Months (total)	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP No.: F183-16230-00029
Facility: urethane Injection molding (UM-1, -2, -3, -4, -6, and UM-7)
Parameter: volatile organic compounds (VOC)
Limit: total combined VOC input to the urethane injection molding units UM-1, UM-2, UM-3, UM-4, UM-6, and UM-7 shall be limited to ninety-eight (98) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization from the mold release agent, mold cleaner, paint blend, and VOC solvents input to the units.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Total VOC Usage This Month (tons)	Total VOC Usage Previous 11 Months (total)	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP No.: F183-16230-00029

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Autoliv, ASP
Source Location:	4868 East Park 30 Drive, Columbia City, IN 46725
County:	Whitley
SIC Code:	3714
Operation Permit No.:	183-16230-00029
Permit Reviewer:	Michael Hirtler / EVP

On May 8, 2003, the Office of Air Quality (OAQ) had a notice published in the Post and Mail, Columbia City, Indiana, stating that Autoliv, ASP had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate an automobile steering wheel manufacturing source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 19 and May 22, 2003, OAQ received comments from Autoliv, ASP in relation to the proposed FESOP Renewal. The comments and related responses follow, with any changes made to the permit shown in bold and deleted permit language shown with a line through it:

Comment 1:

Section A.2(b):

This reads "*one (1) urethane molding unit, to be identified as UM-1 and constructed within 18 months of the issuance date of this renewal approval*". Autoliv ASP would propose that this be changed to read: "*and construction commencing within 18 months of the issuance date of this renewal approval*". This change would be consistent with General Condition B.24 and 326 IAC 2-1.1-9.

Section D.1(b) (facility description box):

This reads "*one (1) urethane molding unit, to be identified as UM-1 and constructed within 18 months of the issuance date of this renewal approval*". Autoliv ASP proposes that this be changed to read: "*and construction commencing within 18 months of the issuance date of this renewal approval*". Again, this change would be consistent with General Condition B.24 and 326 IAC 2-1.1-9.

Section D.2 (facility description box):

This reads "*One (1) urethane molding unit, to be identified as UM-1 and constructed within 18 months of the issuance date of this renewal approval*". Consistent with the above comments, Autoliv ASP proposes that this be changed to read: "*and construction commencing within 18 months of the issuance date of this renewal approval*".

Response to Comment 1:

IDEM, OAQ, agrees that the descriptions provided at Section A.2(b) and the facility description boxes at Sections D.1 and D.2 are inconsistent with Condition B.24 (Advanced Source Modification Approval) and the associated rule, 326 IAC 2-1.1-9. Sections A.2(b) and D.2 are revised below to be consistent with the applicable rule and Condition B.24. The same revision is likewise made to the Section D.1 facility description box, as shown under **Response to Comments 4, 5 and 6:**

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (b) one (1) urethane molding unit, to be identified as UM-1 and ~~constructed~~ **commencing construction** within 18 months of the issuance date of this renewal approval, producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:
 - (1) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
 - (2) three (3) pairs of molds; and
 - (3) three (3) pairs of exhaust cabinets,

SECTION D.2

FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) urethane molding unit, to be identified as UM-1 and ~~constructed~~ **commencing construction** within 18 months of the issuance date of this renewal approval, producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:

- (a) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
- (b) three (3) pairs of molds; and
- (c) three (3) pairs of exhaust cabinets,

controlled by dry filters and exhausting to stack V-4;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 2:

Section A.3(f)(1):

This indicates that the three (3) pressure vented storage tanks (our bulk system for our main raw materials, isocyanate and polyol) were installed in 1998. In fact the first two (2) of these tanks (one (1) isocyanate and one (1) polyol) went into service in April of 2000 and the third tank (also containing polyol) went into service in January of 2001.

Section A.3(j):

This indicates both paved and unpaved roads and parking lots; all of the driveway and parking lot areas are paved at our facility. We have no unpaved areas for vehicle traffic.

Response to Comment 2:

The descriptions of these Section A.3 insignificant activities are revised as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

(f) Other categories with emissions below insignificant thresholds:

- (1) three (3) pressure vented storage tanks, ~~constructed in 1998~~: one (1) of the ~~tanks~~ storing isocyanate **and installed in April 2000**, and the other two (2) storing polyol resin **and installed in April 2000 and January 2001**, with each tank having a capacity of 7,500 gallons, equipped with either nitrogen blanketing evaporation or compressed dry air control, and emitting less than one (1) ton per year of a single HAP and less than 15 pounds per day of VOC.

(j) Paved ~~and unpaved~~ roads and parking lots with public access.

Comment 3:

Section D.1.1(a)(3):

Adhesive appears as one of the VOC materials in this section as well as Section D.1.2. This refers to an adhesive that was originally used at the plant for leather wrapping of steering wheels. The leather wrap operations have been moved to a plant in Mexico. Hence, consistent with this, the adhesive should be removed from these sections.

Response to Comment 3:

Condition D.1.1(a) is a condition established in Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000, that satisfies the best available control technology (BACT) rule requirements pursuant to 326 IAC 8-1-6 (General Reduction Requirements). Since the request to remove reference to "adhesive" does not alter the underlying limits or requirements of this condition, such reference is removed from D.1.1(a)(3). Such reference is likewise removed from Condition D.1.2, with no effect on the limit stated in the condition. The conditions are changed as follows:

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) Pursuant to Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000, and 326 IAC 8-1-6 (General Reduction Requirements), the source shall comply with the following for urethane molding injection operations at UM-2, UM-3, UM-4, UM-6, and UM-7:
- (3) The VOC emissions from the urethane injection molding units shall be limited to 91.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, ~~adhesive~~, and VOC solvents input to the units.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2]

The total combined VOC input to the urethane injection molding units, including urethane molding unit UM-5 as an insignificant activity, shall be limited to ninety-nine (99) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization from the mold release agent, mold cleaner, paint blend, ~~adhesive~~, and VOC solvents input to the units.

Compliance with this condition shall limit the source-wide potential to emit VOC, including the potential to emit of insignificant activities, to less than one-hundred (100) tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70), and 326 IAC 2-2 (PSD), are not applicable to the source.

Comment 4:

Section D.1.2:

Autoliv ASP would propose to delete the phrase “*including urethane molding unit UM-5 as an insignificant activity*”, from this section. This is proposed because of the following information:

UM-5 is a research and development (R&D) machine that was installed in August of 2000 and has recorded a total of 20,944 shots or molding injections in the life of the machine as of May 15, 2003. This number is available because the software within the PLC of this machine records the total number of shots performed on the machine. This information is used primarily for preventive maintenance on the machine. This total number of shots combined with the worst case recipe in terms of VOC emissions that is run on the machine will provide a worst case value in terms of the historical emissions from this R&D machine. It is proposed that the recipe that is used for this worst-case representation of emissions from this machine be the current production wheel airbag (WAB) recipe. This would be a worst case recipe because the WAB parts require more volume of materials and when trials are run on the R&D machine they involve either different foaming systems (different isocyanate and polyol), different mold release, or a different paint recipe. Further, all materials that are run on the machine are equal to or are lower VOC emission materials than the current recipe. For example, recently a trial was run in one (1) day, which ran nine (9) different formulations of a water based paint where test parts were created with each of the minor variations of this paint to be submitted to testing. This also illustrates the difficulty of tracking all of the minor variation of different materials used in the R&D machine for such small amounts of emissions. Also trials have been run on lower VOC or water based mold releases. However, for illustration purposes, utilizing WAB baseline values of:

Mold Release (Acosil 36-9295W):	25.3 ml/shot
Paint Resin (Morton AB 698):	26.9 ml/shot
Catalyst (Morton Soft Touch):	7.7 ml/shot
20,944 x 25.3 = 529,883.2 ml of mold release =	139.98 gal @ 4.64 lbs/gal = 649.51 lbs of emissions
20,944 x 26.9 = 563,393.6 ml of paint resin =	148.83 gal @ 4.36 = 648.90 lbs of emissions
20,944 x 7.7 = 161,268.8 ml of catalyst =	42.60 gal @ 4.07 = 173.38 lbs of emissions
Total =	1,471.79 lbs = 0.736 tons VOC emissions

MEK emissions = 42.60 gallons x 4.05 lbs/gallon MEK = 172.53 lbs = 0.086 tons of MEK emissions.

Hence, based on the total amount of shots run on the R&D machine and a worst case recipe, it is safe to conclude that the total emissions from this unit in its service life to date is less than 0.75 tons total VOCs and less than 0.1 tons MEK. That is a total service life of August 2000 to May 15, 2003, nearly three years. This is a safe representation of this R&D machine's emissions since some fraction of the time when the machine is run there is no paint used in the process. For example, if a different foaming recipe is being tested, the parts (sometimes steering wheel molds are not even used for this,

just a blank, square piece of foam is produced) may not even be painted. Also some leather wrapped rim shot type wheels have no paint/color requirement because the leather will cover all areas of the urethane rim. Additionally, there is no expectation to run any more trials in the future on this machine than has occurred in the past.

In addition to the above, Autoliv ASP would also propose that Section D.1.1(a)(3) be used to satisfy the requirements of D.1.2.

Comment 5:

Section D.1.3(a)

Autoliv ASP proposes that the phrase “*including urethane molding unit UM-5 as an insignificant activity*”, be deleted. This is proposed consistent with the comments on Section D.1.2 above.

Comment 6:

Permit Reporting Form, Page 35 of 39

Facility: Delete UM-5

Limit: Delete the phrase “*including urethane molding unit UM-5 as an insignificant activity*”. This is requested consistent with the information presented above in Section D.1.2.

Permit Reporting Form, Page 37 of 39

Facility: Delete UM-5

Limit: Delete the phrase “*including urethane molding unit UM-5 as an insignificant activity*”. This is requested consistent with the information presented above for Section D.1.2.

Response to Comments 4, 5 and 6:

First, regarding the Permittee’s request to use the VOC emission limit of D.1.1(a)(3) to satisfy the VOC limit of Condition D.1.2, such cannot be granted because proposed urethane molding unit UM-1 is not included in the limit at D.1.1(a)(3). Since the actual date of UM-1 construction can occur at any time after permit issuance, pursuant to Condition B.24, emissions attributable to UM-1 must be limited such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, while it is recognized that the limits expressed in D.1.1(a)(3) and D.1.2 will be identical until UM-1 begins operation, there is no change to either condition due to this comment. However, should the Permittee decide at any time after issuance of this approval that UM-1 will not be constructed, they can submit a request to IDEM, OAQ to revise the permit to remove reference to UM-1, including revising D.1.2 as requested herein.

Regarding urethane molding unit UM-5, the Permittee has established this emission unit as a research and development (R&D) unit, pursuant to 326 IAC 2-7-1(21)(E), *Insignificant Activities*. To the extent that they can be quantified, emissions attributable to insignificant activities are to be included when establishing a pollutant emission rate limit for a FESOP source. Unit UM-5 has been included in the FESOP emission rate limits expressed at D.1.2 and D.1.3. However, instead of including UM-5 in these limits, the potential to emit of this insignificant activity can be subtracted from the respective source-wide allowable VOC and HAP (MEK) emission limits of 100 and 10 tons per year. This would result in a reduction of the draft limits of D.1.2 and D.1.3, whereby such revised limits would apply only to the significant emission units (i.e., UM-1, -2, -3, -4, -6, and -7).

Therefore, based on this request, reference to UM-5 is removed from the Section D.1 facility description box and the emission limits at D.1.2 and D.1.3(a) are revised to remove UM-5 from inclusion in the stated limits. Reference to UM-5 is likewise removed from the quarterly reporting forms located at the end of the permit, without replication herein. Also, for purposes of completeness and consistency, the *Limited Potential to Emit* table from the Technical Support Document (TSD) is replicated below. A similar change is made to page 1 of 5 of Appendix A to the TSD (emissions calculations) (attached).

These changes are as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) five (5) urethane molding units, identified as UM-2, UM-3, and UM-4, constructed in August 1998, and UM-6 and UM-7, respectively constructed in April and July 2000, each producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:
 - (1) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
 - (2) three (3) pairs of molds; and
 - (3) three (3) pairs of exhaust cabinets,controlled by dry filters and exhausting to stacks V-3, V-2, V-1, V-17 and V-18, respectively;
- (b) one (1) urethane molding unit, to be identified as UM-1 and ~~constructed~~ **commencing construction** within 18 months of the issuance date of this renewal approval, producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:
 - (1) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
 - (2) three (3) pairs of molds; and
 - (3) three (3) pairs of exhaust cabinets,controlled by dry filters and exhausting to stack V-4;
- (c) paint mixing room ventilation, through stack V-9;
- (d) paint storage room ventilation, through stack V-10; and
- (e) storage room ventilation, through stack V-16.

~~The following insignificant activities, as defined in 326 IAC 2-7-1(21):~~

~~(b) Emissions from research and development activities, including:~~

~~one (1) nonproduction research and development urethane injection molding unit, identified as UM-5, using four (4) air atomization spray guns, with two (2) exhaust cabinets, controlled by two (2) dry filters, and exhausting to stack V-11.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2]

The total combined VOC input to the urethane injection molding units, ~~including urethane molding unit UM-5 as an insignificant activity,~~ **UM-1, UM-2, UM-3, UM-4, UM-6, and UM-7** shall be limited to ~~ninety-nine (99)~~ **ninety-eight (98)** tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization from the mold release agent, mold cleaner, paint blend, ~~adhesive,~~ and VOC solvents input to the units.

Compliance with this condition shall limit the source-wide potential to emit VOC, including the potential to emit of insignificant activities, to less than one-hundred (100) tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70), and 326 IAC 2-2 (PSD), are not applicable to the source.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4][326 IAC 2-4.1-1]

(a) The total combined input of methyl ethyl ketone (MEK) to the urethane injection molding units, ~~including urethane molding unit UM-5 as an insignificant activity,~~ **UM-1, UM-2, UM-3, UM-4, UM-6, and UM-7** shall be limited to less than ~~ten (10)~~ **nine and nine tenths (9.9)** tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Based on 100% volatilization, the MEK input will equal the MEK emitted. Compliance with this condition shall limit the source-wide potential to emit a single HAP, **including the potential to emit of insignificant activities,** to less than 10 tons per 12 consecutive month period.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Five (5) urethane molding units (UM-2, -3, -4, -6, & -7)	3.45 ⁽¹⁾	3.45 ⁽¹⁾	0.00	99.00 98 ⁽²⁾	0.00	0.00	<10 <9.9 ⁽³⁾ (MEK)	22.31 ⁽³⁾
One (1) urethane molding unit receiving advanced approval (UM-1)	0.69 ⁽¹⁾	0.69 ⁽¹⁾	0.00		0.00	0.00		
R&D urethane molding unit ⁽⁴⁾ (UM-5)	0.27 ⁽¹⁾	0.27 ⁽¹⁾	0.00	0.74	0.00	0.00	0.1 (MEK)	
natural gas combustion ⁽⁴⁾	0.21	0.84	0.07	0.61	9.13	11.04	0.20 (hexane)	0.21
Total Emissions	4.62	5.25	0.07	<100	9.13	11.04	<10 (any single)	<25 (total)

1. Controlled emission rates pursuant to 326 IAC 6-3-2. Assumes PM10 equal to PM.

2. Based on permit Condition D.1.2. This emission limit contains an imbedded 91.0 ton/year limit applicable to UM-2, -3, -4, -6 & UM-7, based on permit Condition D.1.1(a)(3) for BACT.

3. Methyl ethyl ketone (MEK) is the only single HAP with an uncontrolled potential to emit greater than 10 tons/year. Input usage limit based on permit Condition D.1.3. Compliance with MEK usage limit shall also limit total HAPs to less than 25 tons per year.

4. Insignificant activity.

Upon further review, and in addition to the Comments/Responses presented above, the OAQ has decided to make the following changes to this FESOP renewal (changes in bold and strikethrough for emphasis). Similar changes are also made to the Table of Contents, as necessary, without replication below.

1. The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, Condition B.8 is revised to remove paragraph (a) from the condition, along with revising the condition title and associated citations as follows:

B.8 Duty to Supplement and Provide Information ~~[326 IAC 2-8-3(f)]~~ [326 IAC 2-8-4(5)(E)]
~~[326 IAC 2-8-5(a)(4)]~~

-
- (a) ~~The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (e)(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

2. Condition B.13 (Preventive Maintenance Plan) is revised at paragraph (b) to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) is revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been moved to Section D of the permit. Since the general record keeping requirements (i.e., retained for 5 years) are already in Section C, it is not necessary to include them in this condition or in Section D. Finally, some sources are required to have an Operation, Maintenance and Monitoring (OMM) Plan. Instead of having two separate plans, it has been decided that the OMM Plan may satisfy the PMP requirements, and new (d) has been added to this condition to reflect such.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
 - (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to a ~~violation~~ **an exceedance** of any limitation on emissions or potential to emit.
 - (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
 - (d) ~~Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~ **To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**
3. In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a nonroad engine, paragraph (d) has been added to B.18 (Permit Amendment or Revision), as follows:

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

4. Condition B.21 (Inspection and Entry) is revised to provide additional rule cites for clarity.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][**IC 13-30-3-1**]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~inspect~~, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
5. Condition C.1 (Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour) is revised to be more consistent with the rule as follows:
- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]
-
- (a) Pursuant to 40 CFR 52 Subpart P, ~~the allowable~~ particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
 - (b) Pursuant to 326 IAC 6-3-2(e)(2), ~~the allowable~~ particulate emissions ~~rate~~ from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.
6. Condition C.8 (Asbestos Abatement Projects) is revised at new paragraph (f) and updated paragraph (g) to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
-
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
 - ~~(f)~~(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provision of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.**

7. Condition C.13 (Risk Management Plan) is revised so that it is more straightforward, and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68-215]

If a regulated substance, ~~subject to as defined in~~ 40 CFR 68, is present at a source in more than a threshold quantity, ~~40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **source must comply with the applicable requirements of 40 CFR 68.**

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).~~

~~All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

8. Condition C.14 (Compliance Response Plan - Preparation, Implementation, Records, and Reports) is revised at (b)(4) since failure to take reasonable response steps is considered a deviation of the permit. Also, language is added to (e) to clarify that the records that need to be kept are those instances when, in accordance with Section D, response steps are taken. The condition is revised as follows:

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.

(e) The Permittee shall record all instances when, **in accordance with Section D**, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

9. Condition C.15 (Actions Related to Noncompliance Demonstrated by a Stack Test) is revised in order to clarify which documents need to be certified by an authorized individual.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

10. Condition C.16 (General Record Keeping Requirements) is revised to accept records that are electronically accessible, instead of being physically present at a source.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept physically present or electronically accessible~~ at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

11. Condition D.1.9 (Record Keeping Requirements) is revised to include new paragraph (b), consistent with the change to record keeping requirement of Condition B.13 (see No. 2 above).

D.1.9 Record Keeping Requirements

- (b) **To document compliance with Condition D.1.6, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- ~~(b)~~(c) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(c)~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	Autoliv, ASP
Source Location:	4868 East Park 30 Drive, Columbia City, IN 46725
County:	Whitley
SIC Code:	3714
Operation Permit No.:	183-16230-00029
Permit Reviewer:	Michael Hirtler / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Autoliv, ASP relating to the operation of an automobile steering wheel manufacturing source. Autoliv, ASP was issued FESOP No. 183-9405-00029 on July 20, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) five (5) urethane molding units, identified as UM-2, UM-3, and UM-4, constructed in August 1998, and UM-6 and UM-7, respectively constructed in April and July 2000, each producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:
 - (1) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
 - (2) three (3) pairs of molds; and
 - (3) three (3) pairs of exhaust cabinets,controlled by dry filters and exhausting to stacks V-3, V-2, V-1, V-17 and V-18, respectively;
- (b) paint mixing room ventilation, through stack V-9;
- (c) paint storage room ventilation, through stack V-10; and
- (d) storage room ventilation, through stack V-16.

Permitted Emission Units and Pollution Control Equipment Removed from the Source

The source also consists of the following previously permitted emission units and pollution control devices that have been removed from service and are not included in this renewal review:

- (a) one (1) production urethane molding unit identified as UM-1, removed from the source in October 2002; and
- (b) one (1) production urethane molding unit identified as UM-8 (*Note: this emission unit was approved under Significant Permit Revision No. 183-12082-00029, issued June 27, 2000 but was never installed at this source. The source has indicated it will not construct this unit and it is therefore not included in this approval*).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Revision Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

One (1) urethane molding unit, to be identified as UM-1 and constructed within 18 months of the issuance date of this renewal approval, producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour and consisting of:

- (a) twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;
- (b) three (3) pairs of molds; and
- (c) three (3) pairs of exhaust cabinets,

controlled by dry filters and exhausting to stack V-4.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu (MMBtu) per hour, including:
 - (1) two (2) 0.1 MMBtu per hour space heaters;
 - (2) three (3) 0.2 MMBtu per hour space heaters; and
 - (3) four (4) process heaters, each rated at 6.1 million Btu per hour.

- (b) Emissions from research and development activities, including:
 - one (1) nonproduction research and development urethane injection molding unit, identified as UM-5, using four (4) air atomization spray guns, with two (2) exhaust cabinets, controlled by two (2) dry filters, and exhausting to stack V-11.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (d) Emissions from a laboratory:
 - (1) one (1) urethane laboratory, with emissions exhausting to vent V-5; and
 - (2) one (1) quality assurance/quality control laboratory, with emissions exhausting to vents V-7 and V-8.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, or machining fluids:
 - (1) one (1) 1000 gallon oil interceptor tank; and
 - (2) two (2) 55 gallon drums of hydraulic oils.
- (f) Other categories with emissions below insignificant thresholds:
 - (1) three (3) pressure vented storage tanks constructed in 1998: one (1) of the tanks storing isocyanate and the other two (2) storing polyol resin, each tank having a capacity of 7,500 gallons, equipped with either nitrogen blanketing evaporation or compressed dry air control, and emitting less than one (1) ton per year of a single HAP and less than 15 pounds per day of VOC; and
 - (2) two (2) air compressor units, located in the mechanical equipment room, venting hot air to stacks V-12 and V-13.
- (g) Production related activities, including the application of lubricants as temporary protective coatings.
- (h) Production related activities, including closed heating and cooling systems.
- (i) Repair activities including cleaning or repair of heat exchangers.
- (j) Paved and unpaved roads and parking lots with public access.
- (k) Enclosed systems for conveying plastic raw material and plastic finished goods.
- (l) Activities associated with emergencies, including gasoline, diesel, or natural gas emergency generators, including:
 - one (1) 0.06 million Btu per hour natural gas fired emergency generator.

Existing Approvals

- (a) FESOP No. 183-9405-00029, issued on July 20, 1998;
- (b) First Minor Permit Revision No. 183-10698-00029, issued on May 17, 1999;
- (c) Second Minor Permit Revision No. 183-11734-00029, issued on March 24, 2000;
- (d) First Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000;
- (e) First Administrative Amendment No. 183-12434-00029, issued on July 20, 2000; and
- (f) First Reopening No. 183-13119-00029, issued on September 20, 2001.

All conditions from previous approvals were incorporated into this FESOP, except the following changes have been made:

First Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000:

Section A.2 and D.1 at the facility description box have been revised to reflect urethane molding units UM-2, UM-3, UM-4, UM-6, and UM-7 to reflect production capacities for two (2) types of products (i.e., automobile steering wheels).

Reason changed: A letter from the applicant was received by OAQ on November 25, 2002 requesting that the equipment description be revised such that the urethane molding process include a new type of steering wheel to be manufactured at this source. The source indicated that this new product, the rim shot type of steering wheel, would be produced at up to 96 units per hour using the existing molding units (i.e., no new equipment). The applicant provided potential material usage and related emission rate information associated with the new type of steering wheel, and compared such to the potential material usage and emission rates for the existing type of steering wheel, the wheel air bag (WAB) type. The comparative calculations are presented on page 3 of Appendix A to this TSD. Based on the information provided, the applicant has shown the potential hourly production of the rim shot type of steering wheel to use less material than that permitted for the WAB type. Further, the total potential to emit of VOC for the rim shot type, based on 8,760 hours per year, is less than the potential to emit that established the best available control technology (BACT) requirement for the WAB type, as indicated in Condition D.1.1(a)(3). As such, since there is no new equipment and no increase in material usage or corresponding emissions above prior approvals for this process, the descriptive change will be made. There is no other change to this permit due to this request.

D.1.2 Methyl Ethyl Ketone Limitation (HAP)

- (a) The input methyl ethyl ketone from the urethane injection molding units shall be limited to 9 tons per 12 month period (2.05 lb/hr), rolled on a monthly basis, based on 100% volatilization. Since there are no HAP emission controls, the MEK input will equal the MEK output for determination purposes. Therefore, the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-1-3.4 and the Part 70 Permit requirements of 326 IAC 2-7 will not apply.

- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.

Reason changed: Condition D.1.2, now as D.1.3 in this renewal, is revised to remove reference to the 2.05 lb/hr emission rate, which is unrelated to the applicability requirements of 326 IAC 2-1-3.4 (now cited at 326 IAC 2-4.1) and 326 IAC 2-7. Applicability to both of these rules is based solely on an annual (12-consecutive month) emission rate. Also, the limit is adjusted to reflect the 326 IAC 2-8 program limits which are based on *less than* 10 tons for a single HAP, rather than the 9 tons per year limit in the original FESOP. This language is consistent with current IDEM, OAQ permit approvals. Finally, since this is a renewal permit, the requirements of paragraph (b) are obsolete and are eliminated from this approval.

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the methyl ethyl ketone usage limits, volatile organic compound usage limits, MEK emission limits, and VOC emission limits established in Conditions D.1.1 and D.1.2.
- (3) The volume weighted MEK and VOC content of the ingredients used for each calendar month;

Reason changed: The conditions referenced in D.1.9 (i.e., D.1.1 and D.1.2), respectively establish VOC and HAP emission limits that are not to be exceeded, and compliance with these limits should not reflect a "volume weighted" basis. Therefore, the term "volume weighted" is deleted from this record keeping condition. The source has confirmed that materials used, and records kept, for their materials coating processes continue to demonstrate compliance with the limits established in D.1.1 (now D.1.1(a) herein) and D.1.2 (now D.1.3 herein).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on October 15, 2002. Additional information was received on November 25, 2002 and April 9, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (five (5) pages).

Potential To Emit for the New Equipment Receiving Advanced Source Revision Approval Pursuant to 326 IAC 2-8-4(11):

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	11.5
PM-10	11.5
SO ₂	0.0
VOC	19.8
CO	0.0
NO _x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential to Emit (tons/yr)
ethyl benzene	0.8
xylene	1.0
methyl isobutyl ketone (MIBK)	0.1
methyl ethyl ketone (MEK)	2.2
formaldehyde	0.0
TOTAL	4.1

Unrestricted Potential Emissions for the Source

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP. This table also includes the unrestricted potential to emit for the new equipment receiving advanced source revision approval pursuant to 326 IAC 2-8-4(11):

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	73.8
PM-10	74.4
SO ₂	0.1
VOC	122.2
CO	9.1
NO _x	11.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
ethyl benzene	less than 10
xylene	less than 10
methyl isobutyl ketone (MIBK)	less than 10
methyl ethyl ketone (MEK)	greater than 10 (13.3 tons/yr)
formaldehyde	less than 10
miscellaneous HAPs from natural gas combustion	less than 10
TOTAL	greater than 25 (25.3 tons/yr)

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source, issued a FESOP on July 20, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Limited Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Five (5) urethane molding units (UM-2, -3, -4, -6, & -7)	3.45 ⁽¹⁾	3.45 ⁽¹⁾	0.00	99.00 ⁽²⁾	0.00	0.00	<10 ⁽³⁾ (MEK)	22.31 ⁽³⁾
One (1) urethane molding unit receiving advanced approval (UM-1)	0.69 ⁽¹⁾	0.69 ⁽¹⁾	0.00		0.00	0.00		
R&D urethane molding unit ⁽⁴⁾ (UM-5)	0.27 ⁽¹⁾	0.27 ⁽¹⁾	0.00		0.00	0.00		
natural gas combustion ⁽⁴⁾	0.21	0.84	0.07	0.61	9.13	11.04	0.20	0.21
Total Emissions	4.62	5.25	0.07	<100	9.13	11.04	<10 (any single)	<25 (total)
1. Controlled emission rates pursuant to 326 IAC 6-3-2. Assumes PM10 equal to PM. 2. Based on permit Condition D.1.2. This emission limit contains an imbedded 91.0 ton/year limit applicable to UM-2, -3, -4, -6 & UM-7, based on permit Condition D.1.1(a)(3) for BACT. 3. Methyl ethyl ketone (MEK) is the only single HAP with an uncontrolled potential to emit greater than 10 tons/year. Input usage limit based on permit Condition D.1.3. Compliance with MEK usage limit shall also limit total HAPs to less than 25 tons per year. 4. Insignificant activity.								

County Attainment Status

The source is located in Whitley County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Whitley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Whitley County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these pollutant emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

There are no new federal rules applicable to the source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP No. 183-9405-00029, issued on July 20, 1998:

- (a) 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels):

The three (3) 7,500 gallon pressure vented storage tanks, as an insignificant activity, are not subject to this rule because:

- (1) their capacities are less than 40 cubic meters (28.39 cubic meters each); and
- (2) they are not used to store volatile organic liquids (isocyanate and pall resin).

There are still no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) (1) The United States Environmental Protection Agency (US EPA) has established the *Reinforced Plastic Composites Production* source category as requiring hazardous air pollutant control. The U.S. EPA Administrator signed final approval of this rule, which is codified as 40 CFR 63, Subpart WWWW, on March 5, 2003. Upon promulgation, the rule will be applicable to reinforced plastic composite manufacturing operations, which is limited to resins and gel coats that contain styrene by itself or in combination with other monomers or solvents, occurring at a major source of hazardous air pollutants as defined at 40 CFR Part 63.2. This rule will not apply to this source since the source does not use styrene containing resins, and it is not a major source of HAPs after federally enforceable limits.
- (2) The United States Environmental Protection Agency (US EPA) has established the *Plastic Parts and Products (Surface Coating)* source category as requiring hazardous air pollutant control. The U.S. EPA proposed such requirements on December 4, 2002. As proposed this rule, codified as 40 CFR 63, Subpart PPPP, will be applicable to plastic parts and products coating operations occurring at a major source of hazardous air pollutants, as defined at 40 CFR Part 63.2. As currently proposed, this rule will not apply to this source since the source has accepted enforceable limits on its emissions of HAPs and is not a major source of HAPs. The source will evaluate applicability to the rule upon its final promulgation and will comply as required if the rules are determined to apply.

There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 61, and 326 IAC 20 and 40 CFR Part 63) applicable to this source.

- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because it is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs, after enforceable controls and/or limitations).
- (d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

State Rule Applicability - Entire Source

There are no new state rules applicable to the source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP No. 183-9405-00029, issued on July 20, 1998:

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

Pursuant to 326 IAC 2-2 (PSD), this existing minor source, originally constructed in 1998 after the August 7, 1977 rule applicability date, is still not considered a major source. This source is not one of the 28 listed source categories and it does not have the potential to emit of 250 tons per year (tpy) or more of any criteria pollutant. The uncontrolled PTE for the worst-case criteria pollutant emitted at this source, VOC, is 122 tons per year, below the 250 tpy PSD applicability threshold.

The equipment receiving advanced approval pursuant to 326 IAC 2-8-4(11) does not have the potential to emit any criteria pollutant at or above the 250 tpy PSD applicability threshold. The source will continue to be FESOP status after the modification and no attainment regulated pollutant shall be emitted at a rate of 100 tons per year or more. This source shall therefore continue to be a PSD-minor stationary source after the modification. The requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) continue to not apply to this source.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

New urethane molding unit UM-1, herein receiving advanced approval pursuant to 326 IAC 2-8-4(11), does not have a PTE at 10 and 25 tons per year for a single HAP and combined HAPs, respectively. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable to UM-1.

The existing source, newly constructed in 1998, is a major source of hazardous air pollutants (HAPs) with an uncontrolled PTE a single HAP, as methyl ethyl ketone (MEK), at greater than 10 tons per year. Pursuant to original FESOP No. 183-9405-00029, issued on July 20, 1998, and subsequent approvals, the Permittee has limited the source-wide PTE of MEK to less than 10 tons per year to satisfy the requirements of 326 IAC 2-8 (FESOP). The source will continue to comply with this single HAP limit, inclusive of new unit UM-1, to satisfy 326 IAC 2-8 (see FESOP section below). Therefore, the source still does not have the potential to emit at 10 and 25 tons per year for a single HAP and combined HAPs, respectively, and the requirements of 326 IAC 2-4.1-1 continue to not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Whitley County and the potential to emit VOC is limited to less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions. Therefore, the requirements of 326 IAC 2-6 still do not apply.

326 IAC 2-8 (FESOP Program)

Pursuant to this rule, the amount of VOC emitted shall be limited to less than one hundred (100) tons per year, and single and combined HAPs emitted shall be limited to less than 10 and 25 tons per year, respectively. Specifically, the source shall comply as follows:

- (a) The total combined VOC input to the urethane injection molding units, including urethane molding unit UM-5 as an insignificant activity, shall be limited to ninety-nine (99) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization from the mold release agent, mold cleaner, paint blend, adhesive, and VOC solvents input to the units.
- (b) The total combined input of methyl ethyl ketone (MEK) to the urethane injection molding units, including urethane molding unit UM-5 as an insignificant activity, shall be limited to less than less than ten (10) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Based on 100% volatilization, the MEK input will equal the MEK emitted. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per 12 consecutive month period.

- (c) Compliance with (b) of this condition shall also limit the source-wide potential to emit the combination of HAPs, including the potential to emit of insignificant activities, to less than twenty-five (25) tons per 12 consecutive month period. Any change or modification which may increase the source-wide potential to emit the combination of HAPs to 25 tons per 12 consecutive month period shall require OAQ's prior approval before such change can occur.

Compliance with these limitations shall continue to make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A. Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Except where noted, there are no new state rules applicable to individual facilities during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP No. 183-9405-00029, issued on July 20, 1998:

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compounds (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

New urethane molding unit UM-1, herein receiving advanced approval pursuant to 326 IAC 2-8-4(11), does not have a potential to emit of VOC at 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to this facility and records will be kept of VOC usage to verify this status. Any change or modification which may increase potential VOC usage to twenty-five (25) tons per year or more at UM-1 shall require prior approval from the Office of Air Quality (OAQ) before such change can occur. If such approval is required, then pursuant to D.1.1(a)(5), the best available control technology (BACT) determination shall be reopened and reevaluated to include facility UM-1.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Pursuant to Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000, the injection molding process (not including proposed UM-1 discussed separately above) is subject to this rule because the process, as one facility, is newly constructed after January 1, 1980, having the potential to emit VOC at 25 tons per year and it is not regulated by any other Article 8 rule.

Pursuant to Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000, and 326 IAC 8-1-6 (General Reduction Requirements), the source shall comply with the following for urethane molding injection operations at UM-2, UM-3, UM-4, UM-6, and UM-7:

- (a) The VOC content of the mold cleaner used in the urethane injection molding units shall not exceed 8.30 pounds of VOC per gallon as applied and the VOC content of each ingredient used in the paint blend shall not exceed 6.71 pounds of VOC per gallon as applied.
- (b) The following pollution prevention techniques shall be applied:
 - (1) monitoring of the pressure differential across the overspray filter shall be continuous;
 - (2) the spray guns applying the mold release agent and paint blend are the type that can be cleaned without the need for spraying the solvent into the air;
 - (3) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized;
 - (4) storage containers used to store VOC containing materials shall be kept covered when not in use;
 - (5) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
 - (6) proper equipment clean-up and maintenance; and
 - (7) proper testing of spray guns prior to daily use.
- (c) The VOC emissions from the urethane injection molding units shall be limited to 91.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, adhesive, and VOC solvents input to the units.
- (d) Acetone shall remain substituted for the pure methyl ethyl ketone in the paint blend.
- (e) The BACT shall be reopened and reevaluated if another similar operation is going to be installed at the source. BACT will be evaluated for the operations together to determine if the cost of control technology is feasible.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Whitley County. Therefore, this rule is not applicable to this source.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. This source is located in Whitley County. Therefore, this rule is not applicable to this source.

As a result of 326 IAC Article 6, Rule 3 changes, the following rule applicability has changed:

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP, will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action. Therefore, the source shall comply as follows:

Pursuant to FESOP No. 183-9405-00029, issued on July 20, 1998, and 40 CFR 52 Subpart P, the particulate matter (PM) from the urethane injection molding units' spray guns shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the urethane injection molding units' spray guns shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The source shall comply with this requirement by continue use of dry filters for particulate control.

Testing Requirements

While IDEM may require compliance testing at any specific time to determine if the source is in compliance with an applicable limit or standard, compliance testing is not required for this renewal. Compliance testing is not required since the coating material usage and related VOC and volatile organic HAP emissions continue to assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the overspray is required to be controlled by dry filters.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP except the following has changed:

D.1.8 Monitoring

- (a) Monitoring of the pressure differential across the overspray filter shall be continuous while the booth is in operation. Failure to take response steps in accordance with Section C - Compliance Monitoring Requirements, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. Compliance response for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Requirements, shall be considered a violation of this permit.

Reason changed: This renewal requires record keeping of relevant compliance monitoring parameters. Rather than continuously record pressure drop readings, the Permittee has opted to instead conduct monitoring that is consistent with current IDEM, OAQ, permit approvals for surface coating operations, and maintain records for such monitoring. The monitoring is presented in (a) and (b) below.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks V-1, V-2, V-3, V-4, V-17 and V-18 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the source must operate properly to ensure compliance with 326 IAC 5 (Opacity Limitations), 326 IAC 6-3 (Process Operations), and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this automobile steering wheel manufacturing source shall be subject to the conditions of the attached proposed FESOP Renewal No.: F183-16230-00029.

Appendix A: Emissions Summary (Page 1 of 5)

Company Name: Autoliv ASP
Address City IN Zip: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-16230-00029
Reviewer: Michael Hirtler / EVP
Date: March 2003

Potential Uncontrolled Emissions (tons/year)

Emissions Generating Activity for the Equipment/Activities Under this FESOP Revision

Pollutant	Urethane Molding (Existing)	Urethane Molding Receiving Advanced Approval	R & D Urethane Molding Unit*	Combustion*		Total
PM	57.52	11.50	4.56	0.21		73.79
PM-10	57.52	11.50	4.56	0.84		74.42
SO2	0.00	0.00	0.00	0.07		0.07
NOx	0.00	0.00	0.00	11.04		11.04
VOC	99.07	19.81	0.74	0.61		120.23
CO	0.00	0.00	0.00	9.13		9.13
Single HAP	10.79 (MEK)	2.16 (MEK)	0.09 (MEK)	0.20 (Hexane)		13.04 (MEK)
Total HAPs	20.41	4.08	0.15	0.21		24.85

* Insignificant activity. Potential to emit for R&D unit based on insignificant activity threshold of 15 pounds VOC/day and 25 pounds PM/day, extrapolated over 365 days per year, and HAP emissions assumed at same ratio as production unit.

Potential Controlled/ Limited Emissions (tons/year)

Pollutant	Urethane Molding (Existing)	Urethane Molding Receiving Advanced Approval	R & D Urethane Molding Unit*	Combustion		Total
PM	3.45	0.69	0.27	0.21		4.62
PM-10	3.45	0.69	0.27	0.84		5.25
SO2	0.00	0.00	0.00	0.07		0.07
NOx	0.00	0.00	0.00	11.04		11.04
VOC*		98.00	0.74	0.61		99.35
CO	0.00	0.00	0.00	9.13		9.13
Single HAP		<9.9 (MEK)	0.09 (MEK)	0.20 (Hexane)		< 10
Total HAPs		21.54	0.16	0.21		21.91

* Existing urethane molding operation has a separate 91 tpy VOC limit. This is imbedded in the 99 tpy VOC limit for total urethane molding operations. See permit Section D for detailed conditions limiting source emissions.

Appendix A: Emission Calculations
Natural Gas Combustion

Company Name: Autoliv ASP
Address City IN Zip: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-16230-00029
Reviewer: Michael Hirtler / EVP
Date: March 2003

Combustion Unit Type	Total Capacity MMBtu/hr	Potential Thruput MMCF/yr	Emission Factor in lb/MMCF						Potential Emission Rate in tons/year					
			PM*	PM10*	SO2	NOx**	VOC	CO***	PM	PM10	SO2	NOx	VOC	CO
2 Space Heaters (each 0.1 MMBtu/hr)	0.20	1.75	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.01	0.00	0.08	0.00	0.04
3 Space Heaters (each 0.2 MMBtu/hr)	0.60	5.26	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.02	0.00	0.25	0.01	0.11
4 Process Heaters (each 6.1 MMBtu/hr)	24.40	213.74	1.9	7.6	0.6	100.0	5.5	84.0	0.20	0.81	0.06	10.69	0.59	8.98
Emergency generator (0.06 MMBtu/hr)	0.06	0.53	1.9	7.6	0.6	94.0	5.5	40.0	0.00	0.00	0.00	0.02	0.00	0.01
Uncontrolled Potential to Emit: (tons per year)	25.26	221.28							0.21	0.84	0.07	11.04	0.61	9.13

Methodology

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 94 for heat input capacity < 0.3 MMBtu/hr; = 100 for heat input capacity =>0.3 MMBtu/hr

**Emission Factors for CO: Uncontrolled = 40 for heat input capacity < 0.3 MMBtu/hr; = 84 for heat input capacity =>0.3 MMBtu/hr

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPL. D 7/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Potential Hazardous Air Pollutant (HAP) Emissions

Emission Factor in lb/MMcf	HAPs - Organics			HAPs - Metals							Total all HAPs (tons/yr)
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission all combustion units (tons per year):	2.323E-04	1.328E-04	8.298E-03	1.991E-01	3.762E-04	5.532E-05	1.217E-04	1.549E-04	4.204E-05	2.323E-04	2.088E-01

Methodology

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Autoliv ASP
Address City IN Zip: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-16230-00029
Reviewer: Michael Hirtler / EVP
Date: March 2003**

Coating Material & Facility	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
<i>Wheel Air Bag Type Steering Wheels Produced at Urethane Molding Units UM-2, -3, -4, -6, -7 *</i>																
Mold Release	6.93	66.96%	0.0%	67.0%	0.0%	n/a	2.003700	gal/hour	4.64	4.64	9.30	223.15	40.72	17.08	ERR	15%
Mold Cleaner	8.35	92.93%	0.0%	92.9%	0.0%	n/a	0.072300	gal/hour	7.76	7.76	0.56	13.46	2.46	0.00	ERR	100%
Mold Thinner (LPS PreSolve)	6.70	100.00%	0.0%	100.0%	0.0%	0.00%	0.088800	gal/hour	6.70	6.70	0.59	14.28	2.61	0.00	ERR	100%
Paint Resin	8.30	52.50%	0.0%	52.5%	0.0%	n/a	2.129100	gal/hour	4.36	4.36	9.28	222.66	40.64	31.25	ERR	15%
Catalyst	8.10	50.30%	0.0%	50.3%	0.0%	n/a	0.608400	gal/hour	4.07	4.07	2.48	59.49	10.86	9.12	ERR	15%
Polane Accelerator	7.03	95.50%	0.0%	95.5%	0.0%	3.58%	0.060900	gal/hour	6.71	6.71	0.41	9.81	1.79	0.07	187.53	15%
											22.62	542.86	99.07	57.52		
<i>Rim Shot Type Steering Wheels Produced at Urethane Molding Units UM-2, -3, -4, -6, -7 **</i>																
Mold Release	6.93	66.96%	0.0%	67.0%	0.0%	n/a	1.453440	gal/hour	4.64	4.64	6.74	161.87	29.54	12.39	ERR	15%
Mold Cleaner	8.35	92.93%	0.0%	92.9%	0.0%	n/a	0.115680	gal/hour	7.76	7.76	0.90	21.54	3.93	0.00	ERR	100%
Mold Thinner (LPS PreSolve)	6.70	100.00%	0.0%	100.0%	0.0%	0.00%	0.106560	gal/hour	6.70	6.70	0.71	17.13	3.13	0.00	ERR	100%
Paint Resin	8.30	52.50%	0.0%	52.5%	0.0%	n/a	2.032320	gal/hour	4.36	4.36	8.86	212.54	38.79	29.83	ERR	15%
Catalyst	8.10	50.30%	0.0%	50.3%	0.0%	n/a	0.565440	gal/hour	4.07	4.07	2.30	55.29	10.09	8.47	ERR	15%
Polane Accelerator	7.03	95.50%	0.0%	95.5%	0.0%	3.58%	0.000000	gal/hour	6.71	6.71	0.00	0.00	0.00	0.00	187.53	15%
											19.52	468.38	85.48	50.69		
Total Uncontrolled Potential to Emit:***											22.62	542.86	99.07	57.52		
Total Controlled/Limited Potential to Emit:***									12-mos Input Usage Limit (VOC)	Control Efficiency (PM)	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
									91.85%	94.00%	22.62	542.86	91 ***	3.45		

Methodology:

* Wheel Air Bag (WAB) is current product type reflected in Significant Permit Revision (SPR) No. 183-12082-00029, issued June 27, 2000. Pursuant to Condition D.1.1 of the SPR, the urethane molding process is the facility (i.e., the five urethane molding units comprise the facility) and the potential to emit reflects all units combined at a maximum of 6 clamps/unit, 10 shots/clamp/hour and 60 shots/hour/unit. The potential to emit from an individual urethane molding unit is 1/5th of the total presented above.

** The Rim Shot type steering wheel is requested for approval in this renewal. The source will use the existing molding units to manufacture this product. The potential material usage and emissions for this product, which reflects all units combined at a maximum of 6 clamps/unit, 16 shots/clamp/hour and 96 shots/hour/unit, is less than the WAB type shown above. Therefore, this is not considered a modification to this existing facility. The potential to emit from an individual urethane molding unit is 1/5th of the total presented above. No polane accelerator is used in the production of the rim shot steering wheel, per the source.

*** Production of the WAB & rim steering wheels are mutually exclusive, and the total emission rate reflects the worst case emissions from either steering wheel type. Pursuant to SPR No. 183-12082-00029, issued June 27, 2000, molding facility (i.e., UM-2, -3, -4, -6 & -7) shall be limited to 91 tons per twelve (12) consecutive month period. The VOC input limit is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, and adhesive the requirements of Condition D.1.1 for 326 IAC 8-1-6 (BACT).

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Sum of Worst Coatings per booth + Sum of all solvents used

Controlled VOC Emission Rate = Uncontrolled Emission Rate * (1 - VOC Input Limitation)

Controlled PM Emission Rate = Uncontrolled Emission Rate * (1 - Control Efficiency)

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Page 4 of 5 TSD App A

**Company Name: Autoliv ASP
Address City IN Zip: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-16230-00029
Reviewer: Michael Hirtler / EVP
Date: March 2003**

Coating Material & Facility	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
<i>New Urethane Molding Unit UM-1 Receiving Advanced Approval for Construction Within 18-Months of FESOP Renewal Issuance (326 IAC 2-8-4(11)) *</i>																
Mold Release	6.93	66.96%	0.0%	67.0%	0.0%	n/a	0.400740	gal/hour	4.64	4.64	1.86	44.63	8.14	3.42	ERR	15%
Mold Cleaner	8.35	92.93%	0.0%	92.9%	0.0%	n/a	0.014460	gal/hour	7.76	7.76	0.11	2.69	0.49	0.00	ERR	100%
Mold Thinner (LPS PreSolve)	6.70	100.00%	0.0%	100.0%	0.0%	0.00%	0.017760	gal/hour	6.70	6.70	0.12	2.86	0.52	0.00	ERR	100%
Paint Resin	8.30	52.50%	0.0%	52.5%	0.0%	n/a	0.425820	gal/hour	4.36	4.36	1.86	44.53	8.13	6.25	ERR	15%
Catalyst	8.10	50.30%	0.0%	50.3%	0.0%	n/a	0.121680	gal/hour	4.07	4.07	0.50	11.90	2.17	1.82	ERR	15%
Polane Accelerator	7.03	95.50%	0.0%	95.5%	0.0%	3.58%	0.012180	gal/hour	6.71	6.71	0.08	1.96	0.36	0.01	187.53	15%
											4.52	108.57	19.81	11.50		
Uncontrolled Potential to Emit New UM-1:											4.52	108.57	19.81	11.50		
									12-mos Input Usage Limit (VOC)	Control Efficiency (PM)	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
Controlled/Limited Potential to Emit New UM-1:									0.00%	94.00%	4.52	108.57	19.81	0.69		
Total Controlled/Limited Potential to Emit (All Units):**									89.34%	94.00%	27.14	651.43	99.00	4.14		

Methodology:

* Potential to emit reflects the worst case product, the Wheel Air Bag (WAB) type steering wheel, as noted on page 3 of 5 of this TSD, Appendix A.

** Total reflects both this new proposed urethane molding unit UM-1, plus the existing urethane molding facility (i.e., UM-2, -3, -4, -6 & -7). The total VOC input usage to the urethane injection molding units, including new unit UM-1 and urethane molding unit UM-5 as an insignificant activity, shall be limited to ninety-nine (99) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable to the source.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Total = Sum of Worst Coatings per booth + Sum of all solvents used
Controlled VOC Emission Rate = Uncontrolled Emission Rate * (1 - VOC Input Limitation)
Controlled PM Emission Rate = Uncontrolled Emission Rate * (1 - Control Efficiency)

Appendix A: Emission Calculations

HAP Emission Calculations

Company Name: Autoliv ASP
Address City IN Zip: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-16230-00029
Reviewer: Michael Hirtler / EVP
Date: March 2003

Coating Material & Facility	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % ethyl benzene	Weight % xylene	Weight % MIBK	Weight % MEK	Weight % formaldehyde	Weight %	HAP Emission Rates (tons per year)						
										ethyl benzene	xylene	MIBK	MEK	formaldehyde		Total All HAPs
Wheel Air Bag Type Steering Wheels Produced at Urethane Molding Units UM-2, -3, -4, -6, -7																
Mold Release	6.93	2.003700	gal/hour	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mold Cleaner	8.35	0.072300	gal/hour	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mold Thinner (LPS PreSolve)	6.70	0.088800	gal/hour	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paint Resin	8.30	2.129100	gal/hour	5.00%	5.00%	0.00%	0.00%	0.10%	0.00%	3.87	3.87	0.00	0.00	0.08	0.00	7.82
Catalyst	8.10	0.608400	gal/hour	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	0.00	0.00	0.00	10.79	0.00	0.00	10.79
Polane Accelerator	7.03	0.060900	gal/hour	9.00%	51.00%	36.00%	0.00%	0.00%	0.00%	0.17	0.96	0.68	0.00	0.00	0.00	1.80
										4.04	4.83	0.68	10.79	0.08	0.00	20.41
Rim Shot Type Steering Wheels Produced at Urethane Molding Units UM-2, -3, -4, -6, -7																
Mold Release	6.93	1.453440	gal/hour	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mold Cleaner	8.35	0.115680	gal/hour	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mold Thinner (LPS PreSolve)	6.70	0.106560	gal/hour	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paint Resin	8.30	2.032320	gal/hour	5.00%	5.00%	0.00%	0.00%	0.10%	0.00%	3.69	3.69	0.00	0.00	0.07	0.00	7.46
Catalyst	8.10	0.565440	gal/hour	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	0.00	0.00	0.00	10.03	0.00	0.00	10.03
Polane Accelerator	7.03	0.000000	gal/hour	9.00%	51.00%	36.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
										3.69	3.69	0.00	10.03	0.07	0.00	17.49
Total Uncontrolled Potential to Emit (UM-2 - UM-7):*										4.04	4.83	0.68	10.79	0.08	0.00	20.41
Uncontrolled Potential to Emit New UM-1 Receiving Advanced Approval:**										0.81	0.97	0.14	2.16	0.02	0.00	4.08
Total Controlled/Limited Potential to Emit (All Units):***										4.85	5.79	0.81	<10	0.09	0.00	21.54

Methodology:

* Production of the WAB & rim steering wheels are mutually exclusive, and the total emission rate reflects the worst case emissions from either steering wheel type.

** New Urethane Molding Unit UM-1 is requesting advanced approval for construction within 18-Months of FESOP renewal issuance, per 326 IAC 2-8-4(11). The potential to emit reflects 1/5th of that for the worst case product, the Wheel Air Bag (WAB) type steering wheel.

*** Total reflects new proposed urethane molding unit UM-1, plus the existing urethane molding facility (i.e., UM-2, -3, -4, -6 & -7).

Uncontrolled Potential HAP Emission Rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Limited Potential HAP Emission Rate (tons/yr) = Uncontrolled Potential HAP Emission Rate * Coating Material HAP Input Limit (such that single HAP emissions <10 tpy and total HAP emissions < 25 tpy)